

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

vs.

APPROXIMATELY 32.68342694 BITCOIN (AND
FUNDS DERIVED THEREFROM) FORMERLY
HELD IN WALLET ADDRESS
1G3pyCCFENTp8EHANrG-BpmEKNobPqA5CLg,
SEIZED FROM A BINANCE.COM
EXCHANGE.COM EXCHANGE ACCOUNT
ASSOCIATED WITH USER ID 395972026,

Defendant.

No.: CV23-2010

**NON-PARTY CLAIMANT
CHICAGO TITLE INSURANCE
COMPANY'S ANSWER**

Non-party claimant identified as "Victim 5" on Page 13 of Plaintiff United States of America's Verified Complaint for Forfeiture *In Rem*, Chicago Title Insurance Company, a Florida corporation ("Chicago Title") appears through counsel Brian Meenaghan and Fidelity National Law Group, hereby answers Plaintiff United States of America's Verified Complaint for Forfeiture *In Rem* (the "Complaint"), as follows:

CLAIMANT CHICAGO TITLE INSURANCE
COMPANY'S ANSWER - 1

FIDELITY NATIONAL LAW GROUP
THE LAW DIVISION OF FIDELITY NATIONAL FINANCIAL, INC.
601 Union Street, Suite 3225
Seattle, WA 98101
Tel 206.224-6009

1. Chicago Title admits the allegations in Paragraphs 1 through 102 of the Complaint, with the exception of Paragraph 50, and Paragraphs 89 through 97, of the Complaint, and admits Plaintiff United States of America is entitled to the relief requested in Paragraph 102 and Paragraphs 1, 2, 3, and 4 of the Wherefore clause in the Complaint.
2. Answering Paragraph 50 of the Complaint, Chicago Title admits the allegations in Paragraph 50 of the Complaint, provided that the loss stated and verified in Non-party Claimant Chicago Title's Statement of Claim is Chicago Title's full, true, and correct loss caused by the actions and omissions alleged in the Complaint.
3. Answering Paragraphs 89 through 97 of the Complaint, Chicago Title admits the allegations in Paragraphs 89 through 97 of the Complaint, provided that the loss stated and verified in Non-party Claimant Chicago Title's Statement of Claim is Chicago Title's full, true, and correct loss caused by the actions and omissions alleged in the Complaint.

VERIFICATION

I, Jonathan Gass, Assistant Vice President and authorized officer for Chicago Title Insurance Company, attest and declare under penalty of perjury that Chicago Title Insurance Company's claim stated herein is not frivolous, and the information provided in support of said claim is true and correct to the best of my knowledge and belief.

DATED this 21st day of May, 2024


Jonathan Gass

1
2 DATED this 21st day of May, 2024.

3 FIDELITY NATIONAL LAW GROUP

4 /s/ Brian Meenaghan

5 Brian Meenaghan, WSBA #16301

6 Fidelity National Law Group

601 Union Street, Suite 3225

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8 *Attorneys for Non-party Claimant Chicago Title*
9 *Insurance Company*

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CLAIMANT CHICAGO TITLE INSURANCE
COMPANY'S ANSWER - 3

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